



WASHINGTON BUREAU · NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

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August 31, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 11-42; WC Docket No. 09-197; WC Docket 10-90

Dear Ms. Dortch;

On behalf of the NAACP, our nation's oldest, largest and most widely-recognized grassroots-based civil rights organization, I am pleased to submit these comments in support of the Federal Communication Commission's ("the Commission") proposed rule, issued in June of 2015, to modernize the Lifeline program to include access to high-speed broadband. The communities served and represented by the NAACP, and society as a whole, would clearly benefit from any move to increase access to the services provided by the digital world. The NAACP firmly believes that the Commission's proposal is timely and appropriate, given the dramatic changes which have occurred in the world of telecommunications over the last decade.

The NAACP fully supports a final rule in which the Commission sets ambitious goals for the Lifeline program. This includes a program that has the flexibility necessary to reach as many qualified Lifeline subscribers as possible. Recent studies indicate that many of the communities served and represented by the NAACP rely disproportionately on mobile devices; therefore a final rule which has the flexibility to allow mobile broadband products to be offered as well as the more traditional access to broadband through home-based devices through the Lifeline program is especially important. Thus, while we do strongly support the expansion of Lifeline to broadband in the home, we also hope that the Commission will advance a rule which allows Lifeline to be supportive of mobile services. However, access to broadband should not be provided at the expense of voice-only subscribers. The program must expand opportunities, not limit them to only one medium. Program flexibility must also not be provided at the expense of quality, however. The NAACP further urges the Commission to mandate that

Lifeline only supports servicers which offer products of sufficient quality to allow households to complete a variety of on-line activities over the course of a monthly payment-cycle.

The NAACP also strongly opposes any proposals which would result in qualified applicants from not receiving Lifeline services or experience a delay in receiving them. We strongly support the Commission's objections to any proposals which would stop payments to eligible recipients midstream, and we further oppose any proposals which would result in a minimum charge being assessed to Lifeline subscribers; in the creation of waiting lists for qualified applicants; in the imposition of unreasonable or cumbersome requirements on eligible households; or any change which might decrease the availability of this vital program to households which are currently eligible to participate in the Lifeline program. Rather the NAACP supports and pledges to work with the Commission to move towards full participation by eligible subscribers in the Lifeline program and to measure progress towards increased rates.

By increasing the number of people who have access to broadband we are making available countless opportunities to them to which they might otherwise be locked out of, including education, employment, health care, and social services. Lifeline, as we know, was originally created in 1985 with the laudatory goal of expanding the benefits of ready communication to all Americans. In order to keep up with the changes which have occurred in the communications field, it is incumbent that Lifeline expand to meet these new challenges while still enabling eligible subscribers to utilize the benefits of the program which best serve them.

Thank you in advance for your attention to the comments and concerns of the NAACP. Should you have any questions, please feel free to contact me at (202) 463-2940.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Hilary O. Shelton', with a stylized, flowing script.

Hilary O. Shelton
Director, NAACP Washington Bureau &
Senior Vice President for Policy and Advocacy